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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

BARBARA STROUGO, Individually) No. 3:20-cv-10100-RK (TJB)
and on Behalf of All Others Similarly)
Situated,) CLASS ACTION
Plaintiff,) UNOPPOSED MOTION FOR
vs.) PRELIMINARY APPROVAL OF
MALLINCKRODT PUBLIC LIMITED) CLASS ACTION SETTLEMENT
COMPANY, et al.,) AND APPROVAL OF NOTICE TO
Defendants.) THE CLASS
Motion Return Date: October 21, 2024
)

TO: ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE on October 21, 2024, Plaintiffs, by and through their counsel, shall move before the Honorable Robert Kirsch, U.S.D.J., at the United States District Court for the District of New Jersey, in Courtroom 4E located at Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order preliminarily approving the proposed Stipulation of Settlement (the “Stipulation”).

By this motion, Plaintiffs respectfully move the Court for an Order:

1. Preliminarily approving the settlement set forth in the Stipulation (the “Settlement”);
2. Approving the proposed forms of notice and the notice plan, and directing that notices be disseminated pursuant to this plan; and
3. Setting a Settlement Hearing and certain other dates in connection with the final approval of the Settlement.

In support thereof, Plaintiffs rely on the accompanying: (1) Plaintiffs’ Memorandum of Law in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement and Approval of Notice to the Class; (2) the Capeci Decl. and exhibits thereto; (3) the Stipulation; (4) all other pleadings and matters of record; and (5) such additional evidence or argument as may be presented before or at the hearing.

DATED: September 18, 2024

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
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